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ATTORNEY - CLIENT COMMUNICATION
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TO: Philip Morris Companies Inc.

FROM: Hunton & Williams

Philip Morris Companies Inc. ---
Outline of Document Retention Program

I. Objectives

1. eliminate cost of storing unnecessary records
2. eliminate cost of searching for outdated records
3. eliminate erroneous or misleading records
4. eliminate adverse inference

II. Guidelines

1. comply with all applicable federal and state retention requirement
2. retain all records of company's obligations (contracts, letters, etc.)
3. retain all records that document company's compliance with applicable laws and regulations
4. ensure records are disposed of pursuant to standard company policy
5. implement program comprehensively, diligently and consistently in all divisions, sections, etc.
6. audit implementation of program periodically

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Source: https://www.industrydocuments.ucsf.edu/docs/fhck0000

III. Procedures

1. Establish team to develop and implement program

   a. officer of company should head team

   b. each division, section, etc. of company should have knowledgeable person designated as its representative on team

2. Employee education

   a. team implementing program

   b. those responsible for drafting documents

3. Identify all existing document retention policies and procedures

4. Inventory all categories of documents maintained by each division, section, etc.

5. Identify and interpret all laws and regulations governing record retention policies

6. Initial implementation

7. Develop and implement periodic audits

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